UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF GEORGIA SAVANNAH DIVISION

UNITED STATES OF AMERICA)	
)	
vs.)	No. 4:22cr016
)	
SHAQUANDRA WOODS,)	
)	
Defendant.)	

MOTION FOR EXTENSION OF TIME TO RESPOND TO MOTIONS IN LIMINE

This case is currently set for jury selection and trial on July 18, 2023. (Doc 187) The Court's Criminal Trial Management Order contains deadlines geared to that trial date, like requiring the parties to file motions in limine on or before June 20, 2023, and any responses on or before June 27, 2023. (Doc 187-Pg 3) On June 20, 2023, the government filed two motions in limine. (Doc 200, Doc 201)

Undersigned counsel, who has not received or reviewed the discovery in the case, has entered a limited notice of appearance to seek an unopposed continuance of jury selection and trial to a date no earlier than October 9, 2023. That motion asks the Court to set a new Criminal Trial Management Order if it grants the requested continuance. A new Criminal Trial Management Order, with deadlines corresponding with

a continued trial date, would permit undersigned counsel to review the discovery, prepare for trial, and file her own and respond intelligently to the government's motions in limine.

Again, though, any response to the government's motions in limine is currently due June 27, 2023. (Doc 187-Pg 3) If the Court grants the motion for continuance, undersigned counsel requests an extension of time to respond to the government's pending motions in limine until the response time set by the new Criminal Trial Management Order.

Respectfully submitted this 22nd day of June, 2023.

/s/ Amy Lee Copeland Amy Lee Copeland Georgia Bar No. 186730 Attorney for Defendant Woods (LIMITED APPEARANCE)

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CERTIFICATE OF SERVICE

I served today a copy of this motion on counsel for the government by filing it on the Court's CM/ECF portal, which generates an email to all counsel of record with a link to the file-stamped copy of this filing.

This 22nd day of June, 2023.

ROUSE + COPELAND, LLC

/s/ Amy Lee Copeland Amy Lee Copeland Georgia Bar No. 186730 Attorney for Defendant (LIMITED APPEARANCE)

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